

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF COLUMBIA**

IN RE
XXXXXXX XXXXXX
Debtor

: Chapter 13 Case No. XX-XXXXX

**DEBTOR'S MOTION FOR ENTRY OF §1328 CHAPTER 13 DISCHARGE AND NOTICE OF
DEADLINE AND OPPORTUNITY TO OBJECT**

Comes now the debtor and respectfully moves this Court to enter a Chapter 13 Discharge pursuant to 11 U.S.C. §1328, and in support thereof, states as follows:

1. The debtor has completed in full all plan payments under the confirmed Chapter 13 plan including all modifications thereof and the Trustee has accordingly filed a Final Report and Account.

2. The debtor has completed, **after the filing of this case**, the required instructional course concerning Personal Financial Management described in §111 and has filed the requisite certification (Official Form 23).

3. The debtor has not received a discharge in a case filed under Chapter 7, 11 or 12 during the 4-year period preceding the date of the order of relief under this Chapter.

The debtor has not received a discharge in a case filed under Chapter 13 during the 2-year period preceding the date of the order of relief under this Chapter.

4A. The Debtor has not been required by a judicial or administrative order, or by statute to pay any domestic supports obligation as defined in 11 U.S.C. §101(14A) either before this bankruptcy was filing or at any time after the filing of this bankruptcy.

OR

4B. The debtor has made all pre-petition and post-petition Domestic Support Obligations required by judicial or administrative order or by statute and the name and address of each holder of a Domestic Support Obligation is as follows:

Name

Address

5. The debtor's most recent/current address is: _____

6. The name and address of debtor's most recent/current employer/income source is:

7. The debtor hereby certifies that there is no action pending in which the debtor may be found guilty of a felony as described in §522(q)(1)A) or liable for a debt as described in §522(q)(1)B).

WHEREFORE, the debtor respectfully moves this Court to enter a Chapter 13 Discharge pursuant to 11 U.S.C. §1328.

Date

Debtor/Debtor's Attorney

**NOTICE OF OPPORTUNITY AND DEADLINE TO OBJECT TO
MOTION FOR ENTRY OF CHAPTER 13 DISCHARGE**

***PLEASE TAKE NOTICE THAT WITHIN TWENTY (20) DAYS AFTER THE DATE OF THIS NOTICE** you must file and serve a written objection to the motion, together with the proposed order required by Local Bankruptcy Rule 9072-1. The objection and proposed order must be filed with the Clerk of the Bankruptcy Court, U.S. Courthouse, 3rd and Constitution Ave., N.W., Washington, D.C. 20001, and served by mailing a copy to the Debtor/Debtor's Attorney and to the Chapter 13 Trustee.

***IF YOU FAIL TO FILE A TIMELY OBJECTION, THE MOTION MAY BE GRANTED BY THE COURT WITHOUT A HEARING.** The court may grant the motion without a hearing if the objection filed states inadequate grounds for denial. Parties in interest with questions may contact the Debtor/Debtor's Attorney.

Date

Debtor/Debtor's Attorney

CERTIFICATE OF SERVICE UNDER LBR 5005-1(h)

I hereby certify that a copy of the foregoing Motion and Notice of Opportunity to Object, has been faxed or mailed, postage pre-paid, on the date that appears below to: **all scheduled creditors; Cynthia A. Niklas, Esq., Chapter 13 Trustee**, 4545 42nd St, NW #211, WDC 20016-4623 Fax # 202 362-3487; **IRS Centralized Insolvency** POB 21126 Philadelphia PA 19114 Fax # 215-516-2015 & **IRS Chief Counsel** POB 44085 WDC 20026 Fax # 202-874-1317 **DC Tax & Rev.** 941 N Capitol St. NE #810 WDC 20002 Fax # 202-442-6479 & **Attorney Gen. for DC** 441 4th St. NW #6N WDC 20001 Fax # 202-727-6014 **US Attorney** DC Civil Div. Financial Litigation 501 3rd St. NW 4th FL WDC 20001 Fax # 202-514-8780 **Child Support Services Div.** Office of Attorney General 441 4th St. NW 5th FL WDC 20001 Fax # 202-724-3710

Date

Debtor/Debtor's Attorney